

**United States Bankruptcy Court**  
**Western District of Michigan**

One Division Ave., N.  
Room 200  
Grand Rapids, MI 49503

**IN RE:** Debtor(s) (name(s) used by the debtor(s) in the last 8 years, including married, maiden, trade, and address):

**William Richard Bailey**  
345 Centreville St  
Constantine, MI 49042  
SSN: xxx-xx-8136  
**Crystal Jean Bailey**  
345 Centreville St  
Constantine, MI 49042  
SSN: xxx-xx-0968

**Debtor(s)**

**Case Number 03-08649-jrh**

**Chapter 7**

**Honorable Jeffrey R. Hughes**

**NOTICE OF RESCHEDULED HEARING RE: TRUSTEE'S MOTION TO SELL  
PROPERTY**

PLEASE BE ADVISED that the hearing on the above matter has been changed. The hearing will now be held on September 28 , 2006 at 12:30 pm at the:

United States Bankruptcy Court  
Room 114, US Courthouse and Federal Bldg., 410 W. Michigan Ave. Kalamazoo, MI

NOTICE IS HEREBY GIVEN that the court may, in its discretion, orally continue or adjourn the above hearing on the record in open court. If this occurs, parties in interest will not be given further written notice of the continued or adjourned hearing. If an entity is not present at the originally scheduled hearing, information regarding the time, date and place of an orally continued or adjourned hearing may be obtained at the Clerk's office from the court files or docket.

**Dated:** September 5, 2006

/S/

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Kim Davis  
Deputy Clerk

This Notice shall be served via electronic notification and/or sent to the BNC for appropriate service by the Court.  
(sc)



UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MICHIGAN

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IN RE:  
WILLIAM BAILEY and  
CRYSTAL BAILEY,  
Debtors.

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Case No. 03-08649-jcs  
Chapter 7  
Hon. Jo Ann C. Stevenson  
United States Bankruptcy Judge

**TRUSTEE'S MOTION TO SELL PROPERTY**

John T. Piggins, Chapter 7 Trustee herein, by and through his attorneys, Miller Johnson, and as his Motion to Sell Property, states as follows:

1. This case was commenced by the filing of a Voluntary Petition under Chapter 7 of the United States Bankruptcy Code on or about July 11, 2003 (the "Petition Date").

2. Included among the assets in the Debtors' estate is Debtors' book of business as an insurance agent for G.E. Capital (the "Property").

3. This Property generates residual commissions paid on policies that were originally sold pre-petition.

4. Consequently, this Property and the commissions it generates are property of the estate under 11 U.S.C. §541.

5. Otis Hutchinson has offered to purchase the Property for the sum of \$8,000.00 payable as soon as practicable after the sale has been approved by this Court.

6. The Trustee believes that the sale of the Property to purchase is in the best interests of the creditors in this estate for the following reasons:

a. The value of this asset will decrease over time and the bankruptcy estate will recover more if it sells the Property at this time; and

b. Upon investigation, the Trustee believes the proposed purchase price is fair and reasonable.

WHEREFORE, John T. Piggins, Trustee respectfully requests that this Court enter an Order:

- a. Approving the sale on the terms described above; and/or
- b. Granting such other and further relief as this Court deems just.

MILLER JOHNSON  
Attorneys for Trustee, John T. Piggins

Dated: August 15, 2006

By /s/ Dwight K. Hamilton  
Dwight K. Hamilton (P-54805)  
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